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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10 **(HONORABLE IRMA E. GONZALEZ)**

11 UNITED STATES OF AMERICA,)	CASE NO. 08CR00283-IEG
)	
12 Plaintiff,)	DATE: March 3, 2008
)	TIME: 2:00 p.m.
13 v.)	
)	NOTICE OF MOTIONS AND MOTIONS TO:
14 ENRIQUE AYON-CORTEZ,)	
)	1) COMPEL DISCOVERY AND PRESERVE
15 Defendant.)	EVIDENCE; AND
)	2) GRANT LEAVE TO FILE FURTHER
16)	<u>MOTIONS</u>

17 TO: KAREN P. HEWITT, UNITED STATES ATTORNEY; AND
18 JOSEPH ORABONA, ASSISTANT UNITED STATES ATTORNEY:

19 **PLEASE TAKE NOTICE** that, on Monday, March 3, 2008, at 2:00 p.m., or as soon thereafter as
20 counsel may be heard, the accused, Enrique Ayon-Cortez, by and through his attorneys, Sara M. Peloquin,
21 and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the motions listed
22 below.

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MOTIONS

Enrique Ayon-Cortez, the accused in this case, by and through his attorneys, Sara M. Peloquin, and Federal Defenders of San Diego, Inc., pursuant to the United States Constitution, Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an Order:

- 1) To Compel Further Discovery and Preserve Evidence; and
- 2) To Grant Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and any and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted,

DATED: February 15, 2008

/s/ Sara M. Peloquin
SARA M. PELOQUIN
Federal Defenders of San Diego, Inc.
Attorneys for Enrique Ayon-Cortez